

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case Number: CR 05 1849 JH
)
DENNIS WILSON,)
)
Defendant.)

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, Dennis Wilson, by his attorney, Robert J. Gorence of Gorence & Oliveros, P.C., respectfully requests the Court to modify his conditions of release by allowing him to relocate from his mother's home at 1513 Gschwind Pl., SW, Albuquerque, New Mexico to the home of his wife, Judy, at 4028 Hwy 68, Ranchos de Taos, New Mexico 87557. As grounds for this motion, Mr. Wilson states:

2. While residing in Taos, Mr. Dennis Wilson will have an opportunity to work on a full time basis for Four Generations Construction, and will have the opportunity to generate a better income.

3. Mr. Wilson will comply with the requests of his probation officer, Marea Williams, regarding a home inspection of the residence of his wife, Judy, in Ranchos de Taos, New Mexico. Additionally, a dedicated telephone line to accommodate electronic monitoring is in the process of being installed.

4. Mr. Wilson will not relocate to Taos until the home inspection has been completed and the phone line has been installed. It is anticipated that both of these prerequisites will occur by January 10, 2007.

5. Mr. Wilson has been in compliance with all conditions of release to date.
6. All other remaining conditions of release remain in force.
7. AUSA James R.W. Braun has been contacted and does not oppose this motion.
8. U.S. Probation and Pretrial Officer Marea Williams has been contacted and does not oppose this motion.

WHEREFORE, for the reasons stated above, Defendant respectfully requests this Court to modify his conditions of release to allow the Defendant to reside at the home of his wife, Judy, at 4028 Hwy 68, Ranchos de Taos, New Mexico 87557.

Respectfully submitted,

Electronically filed: 01/05/07
Robert J. Gorence
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I HEREBY CERTIFY that a true and correct copy of the foregoing has been faxed to AUSA James R.W. Braun and to U.S. Probation and Pretrial Officer Marea Williams this 5th day of January, 2007.

Electronically filed: 01/05/07
ROBERT J. GORENCE